

## Remarks

Applicants respectfully request that this Amendment After Final Action be admitted under 37 C.F.R. § 1.116.

Applicants submit that this Amendment presents claims in better form for consideration on appeal. Furthermore, applicants believe that consideration of this Amendment could lead to favorable action that would remove one or more issues for appeal.

Claim 9 has been amended. No claims have been canceled. Therefore, claims 1-29 are now presented for examination.

Claim 9 stands rejected under 35 U.S.C. §112, second paragraph, for failing to particularly state a structure as required in an apparatus claim. Applicants submit that claim 9 has been amended to appear in proper condition for allowance.

Claims 1, 2, 5, 6, 7, 9, 10, 13, 14, 15, 17, 18, 21-23, 25-29 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Allen et al. (U.S. Patent No. 6,895,453) in view of Ito et al. (U.S. Patent No. 6,684,209) in further in view of Levitt (U.S. Patent No. 5,787,012). Applicants submit that the present claims are patentable over Allen in view of Ito and Levitt.

In order to establish a *prima facie* case of obviousness there must first be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, *the prior art reference (or references when combined) must teach or suggest all*

the claim limitations.” (Emphasis added). *In re Vaech*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). Manual of Patent Examining Procedure (MPEP), 8<sup>th</sup> Edition, Revision 2, May 2004, §2143.

Allen discloses remote devices connected to a Fibre Channel network using a bridge. The bridge serves as a gateway to SCSI devices. Each of the SCSI devices includes a unique identifier. The respective device identifiers may include the vendor identifier for the device, the product identifier for the device, and the serial number corresponding to the device. Allen further discloses that the SCSI devices receive the device identifier after a device swap occurs. This device identifier is compared with the previous device identifier. Because the device identifiers do not match, the Fibre Channel device determines that a SCSI device change has taken place and is able to take corrective action without compromising data integrity on either the SCSI device or in the Fibre Channel device attached to Fibre Channel interconnect. See Allen at col. 8, ll. 65 – col. 9, ll. 28.

Ito discloses a storage subsystem that can comprise a management table that defines relationships among information WWN which uniquely identifies an accessing host computer, a Logical Unit Number (LUN) in the storage subsystem which the host computer is permitted to access, and a Virtual Logical Unit Number (Virtual LUN) which is created from the LUN identifiers in any way of numbering in accordance with user's convenience. See Ito at col. 2, ll. 16-23.

Levitt discloses an integrated circuit that includes a first metal layer with first layer identification signal writing circuitry connections to produce first metal layer circuit identification signals. The integrated circuit also has a second metal layer with second

layer identification signal writing circuitry connections to produce second metal layer circuit identification signals. Logic circuitry in the first metal layer has input connections to the first layer identification signal writing circuitry connections and the second layer identification signal writing circuitry connections. The logic circuitry combines the first metal layer circuit identification signals and the second metal layer circuit identification signals to produce a circuit identification number. The value of the circuit identification number can be changed by altering the first layer identification signal writing circuitry connectors or the second layer identification signal writing circuitry connections. Thus, the value of the circuit identification number can be easily changed at the metal layer at which revisions are made. See Levitt at Abstract.

Claim 1 of the present application recites:

A method comprising:  
retrieving a first vendor identifier (ID) from a table;  
retrieving a second vendor ID from the table; and  
generating a virtual ID by randomizing the first vendor ID and the second vendor ID.

Applicants submit that Allen, Ito and Levitt each fail to disclose or suggest generating a virtual ID by randomizing a first vendor ID and a second vendor ID. In fact, the Final Office Action admits that the combination of Allen and Ito fails to disclose or suggest generating a virtual ID by randomizing a first vendor ID and a second vendor ID. See Final Office Action at page 3, ll. 19 and 20.

Levitt also fails to disclose or suggest generating a virtual ID by randomizing a first vendor ID and a second vendor ID. Instead Levitt discloses logic circuitry that combines a first metal layer circuit identification signals and a second metal layer circuit identification signals to produce a circuit identification number. Applicants submit that combining first and second metal layer circuit identification signals to produce a circuit

identification number is not equivalent to generating a virtual ID by randomizing a first vendor ID and a second vendor ID.

Since Allen, Ito and Levitt all fail to disclose or suggest generating a virtual ID by randomizing a first vendor ID and a second vendor ID any combination of Allen, Ito and Levitt would also fail to disclose or suggest such a feature. As a result, the combination of Allen, Ito and Levitt fails to teach or suggest all of the limitations of claim1.

Moreover, there is no suggestion or motivation in the references or in the knowledge generally available to one of ordinary skill in the art to combine the teachings of Allen, Ito and Levitt. For instance, there would be no motivation for one of ordinary skill in the art to combine the integrated circuit with identification signal writing circuitry on multiple metal layers with disclosed in Levitt with the mechanism for improved handling of fiber channel remote devices in Allen, and the security method for a storage subsystem disclose in Ito. Therefore, it would be impermissible hindsight to combine Allen, Ito and Levitt. Accordingly, claim 1 is patentable over Allen in view of Ito and Levitt.

Claims 2-8 depend from claim 1 and include additional features. Therefore, claims 2-8 are also patentable over Allen in view of Ito and Levitt.

Claim 9 recites:

An apparatus comprising:  
a table to store two or more vendor identifiers (IDs);  
and  
circuitry to retrieve a second vendor ID from the table; and  
circuitry to retrieve a first vendor ID and a second vendor ID from the table and to generate a virtual ID by randomizing the first vendor ID and the second vendor ID.

For the reasons described above with respect to claim 1, claim 9 is also patentable over Allen in view of Ito and Levitt. Since dependent claims 10-16 depend from claim 9, and

include additional features, claims 10-16 are also patentable over Allen in view of Ito and Levitt.

Claim 17 recites:

An article comprising: a storage medium having stored therein instructions that when executed by a machine result in the following:  
retrieving a first vendor identifier (ID) from a table;  
retrieving a second vendor ID from the table; and  
generating a virtual ID by randomizing the first vendor ID and the second vendor ID.

Thus, for the reasons described above with respect to claim 1, claim 17 is also patentable over Allen in view of Ito and Levitt. Since dependent claims 18-24 depend from claim 17, and include additional features, claims 18-24 are also patentable over Allen in view of Ito and Levitt.

Claim 25 recites:

A system comprising:  
a circuit board comprising a circuit card slot; and  
a circuit card capable of being inserted into the slot,  
the circuit card comprising:  
a table to store two or more vendor identifiers (IDs);  
and  
circuitry to retrieve a first vendor ID and a second vendor ID from the table and to generate a virtual ID by randomizing the first vendor ID and the second vendor ID.

Therefore, for the reasons described above with respect to claim 1, claim 25 is also patentable over Allen in view of Ito and Levitt. Since dependent claims 26-29 depend from claim 17, and include additional features, claims 26-29 are also patentable over Allen in view of Ito and Levitt.

Claims 3, 4, 8, 11, 12, 16, 19, 20 and 24 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Allen et al. in view of Ito et al. in view of Levitt in further view

of Hilton (U.S. Pub. No. 2004/0078401). Applicants submit that the present claims are patentable over Allen in view of Ito and Levitt even in view of Hilton.

Hilton discloses nondeterministic rounding of fixed point values in a digital signal processor. A pseudo-random value is generated and a preselected number of pseudo-random bits are added to the result to be rounded prior to truncation being applied. Pseudo-random numbers may be generated by means including two maximal-length pseudo-random sequence generators. Nonetheless, Hilton does not disclose or suggest generating a virtual ID by randomizing a first vendor ID and a second vendor ID.

As discussed above, Allen, Ito and Levitt all fail to disclose or suggest generating a virtual ID by randomizing a first vendor ID and a second vendor ID. Accordingly, any combination of Allen, Ito, Levitt and Hilton would also not disclose or suggest such a feature. As a result, the present claims are patentable over the combination of Allen, Ito, Levitt and Hilton.

Applicants respectfully submit that the rejections have been overcome, and that the claims are in condition for allowance. Accordingly, applicants respectfully request the rejections be withdrawn and the claims be allowed.

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,  
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